

REGULATORY COMPLIANCE

1.0 PURPOSE AND SCOPE

1.1 The purpose of this procedure is to ensure that the Refuse Disposal Division (RDD) of the Environmental Services Department (ESD) has a documented means of evaluating compliance with relevant environmental legislation and regulations associated with its operations.

1.2 This procedure covers identifying, correcting and preventing regulatory violations associated with the laws, regulations, and other requirements established at the federal, state and local levels that apply to the operations of the RDD.

2.0 RESPONSIBILITY AND AUTHORITY

2.1 Deputy Director RDD – is responsible for ensuring that Section Managers comply with the requirements set forth in the permit conditions and laws and regulations associated with the operations of the RDD. The Deputy Director reviews and approves all program and project plans designed to meet or exceed the regulatory requirements for the operation and maintenance activities of the RDD. In addition, he/she will review all inspection checklists and ensure that “Observations,” “Areas of Concern,” and “Notice of Violations” are addressed in a timely and appropriate manner.

2.2 Section Managers – Section Managers are responsible for knowing and complying with the environmental laws and regulations pertinent to their sections. Section Managers are also responsible for meeting and/or exceeding the requirements set forth in the permit conditions and laws and regulations associated with the operations of the RDD. Section Managers will review all inspection checklists and ensure that all staff members are informed, trained, and comply with all regulatory requirements associated with their respective areas of responsibility.

2.3 Employees – Employees are responsible for notifying their supervisor when they discover or suspect a regulatory non-compliance has or will occur.

3.0 PROCEDURE

3.1 Compliance assessments are accomplished through routine, (daily, weekly, monthly, quarterly, etc.) inspections conducted by RDD staff to ensure that permit conditions and other regulatory requirements associated with its operations are met on a continuous basis.

These inspections include, but are not limited to:

- quarterly groundwater monitoring events,
- weekly landfill gas “flare” system readings,
- periodic (weekly, bi-weekly, monthly, etc.) landfill gas probe readings,
- daily refuse “final cover” material inspections,
- quarterly landfill cap inspections,
- seasonal (per storm event) stormwater control device inspections,
- daily bird control assessment,

Section Managers shall routinely train their staff and monitor their performance for all regulated activity within their section. Training and performance monitoring can be accomplished internally or through an appropriate outside resource, i.e. Department staff, consultants, regulatory agencies, etc.

3.2 Periodic (monthly, quarterly, annual) regulatory inspections are also conducted to ensure RDD is meeting the minimum guidelines set forth in the permit conditions and laws and regulations associated with the Division’s operations. When periodic site visits (i.e., planned regulatory inspections, Environmental Management System audits, etc.) are scheduled, Section Managers will ensure that all personnel, equipment, and resources required to complete the activity are available.

3.3 The Deputy Director-RDD or his/her designee shall establish a schedule in which, on a quarterly basis, the Division will assess its regulatory compliance. The results of this quarterly report will be sent to the EMR for record retention.

3.4 Section Managers are responsible for correcting all deficiencies identified through either internal and external inspections, audits, or as a result of new or modified regulations and permit conditions. Corrective action will be directed by regulatory agencies, the Deputy Director RDD, or through Corrective/Preventive Action Requests as a result of internal audits or observations of Division staff. Results of all regulatory inspections and audits will be sent to the RDD Deputy Director for review and resolution.

4.0 REFERENCES

Cross-reference any summary listings of legal requirements or other registries, etc.

RDD SEOP 4.3.2 “Legal and Other requirements”

EMS-Manual Section 4.3.2, “Legal and Other requirements”
Section 4.5.1.2 “Regulatory Compliance”

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